

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

ROBYN WILLIAMS, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SPIN MASTER, LTD., a Canadian Corporation,

Defendant.

Case No. 07CV6387

Hon. David H. Coar

PARTIES JOINT SUBMISSION ON SCHEDULING

The parties to this case, having conferred through counsel by in-person meetings at the behest of this Court, have discussed scheduling matters addressed in Rule 16(b) in advance of the discovery conference scheduled by this Court to take place on February 4, 2008 at 9:00 a.m., and state as follows:

Defendant Seeks a Stay Pending the MDL Panel's Consolidation Decision

Defendant Spin Master, Ltd. ("Spin Master") has filed a petition before the Multidistrict Litigation Panel seeking the consolidation of this case together with six other similar putative national class action lawsuits filed in federal courts across the country. (Docket 26). At the same time Spin Master filed a motion in the instant case seeking a stay of proceedings pending the decision by the MDL Panel. (Docket 27).

Plaintiff Opposes the Request for a Stay of This Action and Proposes a Schedule

Plaintiff does not believe a stay of this action is appropriate, and is filing a separate brief opposing the stay request. Plaintiff believes discovery should commence now, and proposes the following schedule:

1. Discovery Schedule and Deadlines:

- A. All disclosures required by Rule 26(a)(1) shall be made on or before February 15, 2008.
- B. Any amendments to pleadings or actions to join other parties shall be filed on or before June 9, 2008.
- C. Cutoff of fact discovery: March 20, 2009
- D. Parties to disclose expert testimony pursuant to Rule 26(a)(2) on or before November 10, 2008.
- E. Parties may depose the other side's expert at any time prior to January 9, 2009.
- F. Parties to disclose any rebuttal expert pursuant to Rule 26(a)(2)(c) at any time prior to February 13, 2009.
- G. Parties may depose the other side's rebuttal expert at any time prior to March 20, 2009.

2. Motions

Any dispositive motions to be filed on or before April 20, 2009.

3. Final Pretrial Order and Conference

The final pretrial order shall be filed on or before July 20, 2009.

4. Pretrial Conference and Trial

The final pretrial conference trial are to be set by the Court.

5. Status Hearing

A further status hearing should be set by the court for late April, 2008, by which time the parties may know the status of Defendant's consolidation request to the MDL Panel.

Dated: January 28, 2008

Respectfully submitted,

SPIN MASTER, LTD.

By: /s/ Thomas J. Wiegand
One of its attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2008, I filed the above and foregoing with the Court's ECF system and by doing so served a copy on all the parties.

/s/ Thomas J. Wiegand
ATTORNEY FOR SPIN MASTER